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**Cc:** Snowbarger, Robert[Snowbarger.Robert@epa.gov]; Vargo, Steve[Vargo.Steve@epa.gov]; Jones, Bruce[Jones.Bruce@epa.gov]; Murdock, James[Murdock.James@epa.gov]; Mustafa, Golam[mustafa.golam@epa.gov]  
**From:** Bellew, Renee  
**Sent:** Thur 5/10/2018 3:03:36 PM  
**Subject:** FW: Question for ODEQ

Hi Patrick,

As we talked about yesterday, HQ wants to make sure their understanding of this process is correct. See the questions below.

Thanks.

**From:** Faison, George  
**Sent:** Thursday, May 10, 2018 8:15 AM  
**To:** Bellew, Renee <bellew.renee@epa.gov>  
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**Subject:** Question for ODEQ

Hi Renee - question on permitted boundary below.

OAC 252:4-7-58(2), regarding Tier 1 permit mods, states the following:

B) On-site and off-site land disposal facilities.

Modification of an existing land disposal permit for a

lateral expansion within permitted boundaries.

(C) Capacity increases of less than 25% with exceptions. The modification of a solid waste permit, excluding incineration permits, involving a request for less than twenty-five percent (25%) increase in permitted capacity for storage processing or disposal when the request is for equivalent methods, units or appurtenances as those permitted and which does not involve expansions of permitted boundaries.

We wanted to confirm, based on our earlier call, that 1) “permitted boundary” always means permitted unit boundary, and not the facility boundary; and 2) any lateral expansions or capacity increases of CCR landfills or surface impoundments would be at least a Tier 2, or Tier 3 if offsite? If so, is there a specific standard or document that we can cite as a reference? Would these provisions only apply in a MSWLF scenario?

Thanks for your help!!!

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